

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - - - -

IN RE:) MDL No. 2804
NATIONAL PRESCRIPTION)
OPIATE LITIGATION)

) Case No.
This Document Relates To:) 1:17-md-2804
)

The County of Lake, Ohio v.) Judge
Purdue Pharma L.P., et al.) Dan Aaron
Case No. 18-op-45032) Polster
)

The County of Trumbull, Ohio)
v. Purdue Pharma L.P.,)
et al.)
Case No. 18-op-45079)

Track 3 Cases)

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Remote Videotaped Deposition of:
G. CALEB ALEXANDER, M.D.
Appearing Remotely from
Baltimore County, Maryland

February 11, 2022
1:16 p.m.

Reporter: Kristin Wegryn, RMR, CRR
Appearing Remotely from
Cuyahoga County, Ohio

1 Q. Fair.

2 That's what I was trying to understand.
3 So, for line 1, for example, in your proposal of
4 testing all universal -- or screening all
5 pregnant women for opioid use, do you know
6 whether your proposal changes current practices
7 at all?

8 A. I didn't try to plug holes here. I
9 wasn't trying to look carefully and patch each
10 hole that Lake County may have open, whether a
11 tiny pinhole or a huge pothole.

12 You know, my, my effort was to develop a
13 comprehensive set of programs and services that,
14 if implemented and implemented in a coordinated
15 fashion and well governed, over time could lead
16 to significant reductions and, frankly, decrease
17 by half rates of opioid use disorder and
18 associated morbidity and mortality in the county.

19 Q. So the answer to my question is no, you
20 don't know how that proposal for that particular
21 line item is different from what currently
22 happens?

23 MR. WEINBERGER: Objection. Form.

24 A. If you're asking whether I know whether
25 2,192 pregnant women last year in Lake County

1 focusing on the number of individuals who have
2 opioid use disorder. I appreciate your plan goes
3 beyond that, as well.

4 But just focusing on the folks who you
5 estimate have opioid use disorder in Lake and
6 Trumbull counties, you don't make any distinction
7 regarding the source of those individuals' opioid
8 use disorder, correct?

9 A. Well, I call for services and programs
10 to address different groups of individuals. So,
11 you know, syringe service programs aren't for
12 people that aren't using intravenously and the
13 like.

14 Q. Okay. So folks who -- depending on how
15 they -- they're currently using their drug. But
16 what I'm -- I meant it slightly differently, so
17 let me try to ask my question again.

18 Your abatement plan would provide
19 treatment services to those individuals who never
20 took a prescription opioid but became addicted to
21 illicit opioids, correct?

22 A. Yes. And some -- I mean, there's no
23 other way to abate the opioid epidemic. I've
24 never seen an abatement plan that said we're just
25 going to treat people that are using heroin and

1 have prior prescription opioid use, but we're not
2 going to treat people that just have prescription
3 opioid use.

4 So, of course, there's some people that
5 are using illicit opioids that have never used
6 prescription opioids but wouldn't be using
7 illicit opioids but for the historic oversupply
8 of prescription opioids in Lake and Trumbull
9 counties.

10 Q. So I just want to make sure I understand
11 your answer.

12 So your plan would provide treatment
13 services to individuals who had never taken a
14 prescription opioid dispensed by CVS, Walmart, or
15 Walgreens, correct?

16 A. Yes. My plan would treat -- would
17 provide services for anybody with opioid use
18 disorder because, to my knowledge, that's the
19 only way to abate the opioid epidemic.

20 Q. Okay. So talking about your plan.
21 Under your plan, who do you envision would
22 implement the plan?

23 A. Well, which county are we talking about?

24 Q. Well, so I guess let's start with Lake
25 County.

CERTIFICATE

The State of Ohio,)
) SS:
County of Cuyahoga.)

I, Kristin Wegryn, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within-named witness, G. CALEB ALEXANDER, M.D., was by me first duly sworn to testify the truth, the whole truth, and nothing but the truth in the cause aforesaid; that the testimony then given by the above-referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above-referenced witness.

I do further certify that this deposition was taken remotely at the time and place in the foregoing caption specified and was completed without adjournment. I do further certify that I am not a relative, counsel, or attorney for either party, or otherwise interested in the event of this action.

IN WITNESS WHEREOF, I have hereunto set
my hand and affixed my seal of office at
Cleveland, Ohio, on this 16th day of February
2022.

Kristin L. Weigman

Kristin Wegryn, RMR, CRR
Notary Public State of Ohio
Commission expiration: July 23, 2023